

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE ORGANOGENESIS SECURITIES
LITIGATION

Case No.: 1:04cv10027-JLT

**PLAINTIFFS' ASSENTED-TO MOTION FOR EXTENSION OF TIME TO FILE
REPLY IN FURTHER SUPPORT OF MOTION FOR CLASS CERTIFICATION AND
TO FILE THE REPLY UNDER SEAL**

Plaintiffs, pursuant to Fed. R. Civ. P. 6(b), respectfully request an extension of time of two weeks, until November 10, 2006, to file their Reply in further support of their Motion for Class Certification. As grounds for this motion, Plaintiffs state that the proposed extension would have no effect on the April 25, 2007 cut-off date for discovery set forth by this Court in the Order dated April 26, 2006. *See* Dkt. No. 115.

Plaintiffs further move this Court for leave to file the Reply under seal. As grounds for this motion, Plaintiffs state that Paragraph 5 of the Joint Protective Order entered on July 26, 2006, which governs the handling of confidential material filed in this action requires "a party filing any portion of briefs, pleadings or other filings with the court that contain or refer to Confidential Material" to attempt to have the Confidential Material filed under seal. The Reply contains excerpts from and references to material that is designated Confidential Material.

Defendants assent to both the extension of time to file the Reply and the filing of that Reply under seal.

WHEREFORE, Plaintiffs respectfully request that this Court grant them an extension of time until November 10, 2006, to file their Reply in Further Support of Class Certification, and to file that Reply under seal.

Dated: October 23, 2006

MOULTON & GANS, P.C.

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CERTIFICATION PURSUANT TO LOCAL RULE 7.1

I, Peter Sloane, hereby certify that I conferred via email on October 19, 2006 concerning the motion for extension of time to file the Reply in further support of class certification, and the motion to file the Reply under seal, with Jonathan A. Shapiro, Esquire, Wilmer Cutler Pickering Hale and Dorr LLP, counsel for Defendants Donna Abelli Lopolito, Michael Sabolinski, Philip Laughlin, and Albert Erani, with Peter Saparoff, Esquire, Mintz, Levin, Cohn, Feris Glovsky and Popeo, P.C., counsel for Defendant Herbert M. Stein; and Sara Jane Shanahan, Esquire, Griesinger, Tighe & Maffei, LLP, counsel for Defendant John J. Arcari. Defendants assent to this Motion for extension of time to file the Reply and to file it under seal.

/s/ Peter Sloane
Peter Sloane

CERTIFICATE OF SERVICE

I, Peter Sloane, hereby certify that a true copy of the above document was served upon the attorney of record for each party via ECF.

/s/ Peter Sloane
Peter Sloane